

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

This Document Relates To:

Breathitt County Board of Education v. Meta Platforms Inc., et al

MDL No. 3047

Case No. 4:23-cv-01804-YGR

**DECLARATION OF ASHLEY M.
SIMONSEN IN SUPPORT OF
DEFENDANTS' REPLY IN SUPPORT OF
MOTION FOR SUMMARY JUDGMENT
(BREATHITT) (SD MSJ No. 1)**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

Date: January 26, 2026
Time: 8:00 am

Place: Courtroom 1, 4th Floor

DECLARATION OF ASHLEY M. SIMONSEN

I, Ashley M. Simonsen, declare as follows:

1. I am a partner with the law firm Covington & Burling LLP, counsel of record for
 2 Defendants Meta Platforms, Inc. f/k/a Facebook, Inc.; Facebook Holdings, LLC; Facebook Operations,
 3 LLC; Meta Payments Inc. f/k/a Facebook Payments Inc.; Meta Platforms Technologies, LLC f/k/a
 4 Facebook Technologies, LLC; Instagram, LLC; and Siculus LLC f/k/a Siculus, Inc. I have personal
 5 knowledge of the following facts and events, and, if called as a witness, I could and would testify
 6 competently thereto.

7. I submit this Declaration in support of Defendants' Reply in Support of Defendants'
 8 Motion for Summary Judgment (BREATHITT) (SD MSJ No. 1), filed concurrently with this Declaration.

9. Attached as **Reply Exhibit 1** is a true and correct copy of excerpts of the Kera Howard
 10 30(b)(6) Deposition transcript, dated March 10, 2025.

11. Attached as **Reply Exhibit 2** is a true and correct copy of excerpts of the Phillip Watts
 12 Deposition transcript, dated July 28, 2025.

13. Attached as **Reply Exhibit 3** is a true and correct copy of excerpts of the Phillip Watts
 14 30(b)(6) deposition transcript, dated April 22, 2025.

15. Attached as **Reply Exhibit 4** is a true and correct copy of excerpts of the Daphne Noble
 16 Deposition transcript, dated July 29, 2025.

17. Attached as **Reply Exhibit 5** is a true and correct copy of excerpts of the Jeremy Hall
 18 Deposition transcript, dated July 28, 2025.

19. Attached as **Reply Exhibit 6** is a true and correct copy of excerpts of the Kera Howard
 20 Deposition transcript, dated March 10, 2025.

21. Attached as **Reply Exhibit 7** is a true and correct copy of excerpts of the Kera Howard
 22 Declaration, dated November 7, 2025.

23. Attached as **Reply Exhibit 8** is a true and correct copy of excerpts of the Jeremy Hall
 24 Deposition transcript, dated April 23, 2025.

25. Attached as **Reply Exhibit 9** is a true and correct copy of excerpts of the Jeremy Hall
 26 30(b)(6) Deposition transcript, dated April 23, 2025.

12. Attached as **Reply Exhibit 10** is a true and correct copy of excerpts of the Daphne Noble 30(b)(6) Deposition transcript, dated March 11, 2025.

13. Attached as **Reply Exhibit 11** is a true and correct copy of excerpts of the William Noble Deposition transcript, dated July 28, 2025.

14. Attached as **Reply Exhibit 12** is a true and correct copy of excerpts of the Stacy McKnight
30(b)(6) Deposition transcript, dated April 21, 2025.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: December 5, 2025

By: Ashley M. Simonsen
Ashley M. Simonsen